

IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	)	
WILLIAM A. BROWNLEE, SR.,	)	CASE NO.: 24-10598-PMM
	)	CHAPTER 13
DEBTOR,	)	

**OBJECTION TO CONFIRMATION OF PLAN**

COMES NOW, Eray Guven, ("Creditor") by and through his undersigned attorneys, and for his Objection to Confirmation of Debtors Chapter 13 Plan, herein states and alleges as follows:

1. This Court has exclusive jurisdiction over this proceeding. Debtor filed this Petition under Chapter 13 of the United States Bankruptcy Code on or about February 23, 2024.
2. Creditor is Debtor's Landlord. The Parties have a lease for the property located at 34 Centura, Cherry Hill, NJ 08003.
3. As of the petition date, Creditor's claim is \$6,400.00 with \$3,025.00 as a priority claim. A Proof of Claim was filed on April 22, 2024.
4. Debtor's Plan fails to indicate whether the residential lease will be assumed or rejected. Additionally, the Plan fails to address any type of payment, priority or not, to Creditor.
5. Therefore, the Plan fails 11 U.S.C. §1322 (a)(2) & (4), and pursuant to 11 U.S.C. §1325 the Plan cannot be confirmed.

WHEREFORE, Eray Guven, prays that its Objection to Confirmation of Plan be sustained, and for all further relief as is just and proper.

Respectfully submitted,

/s/ Jillian M. Pratt

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**CERTIFICATE OF SERVICE**

I hereby certify that on or before May 9, 2024, I caused a true and correct copy of the foregoing to be served either by CM/ECF notice to those so authorized, and first-class mail as indicated to the parties reflected on the attached.

*DEBTOR*

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*TRUSTEE*

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*U.S. TRUSTEE*

UNITED STATES TRUSTEE  
OFFICE OF UNITED STATES TRUSTEE  
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PHILADELPHIA, PA 19107

Respectfully submitted,

/s/ Jillian M. Pratt

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